

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

CV 15

2169

Renato Scantlebury  
349-14-16630  
NYSED# 05449560 H

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

The City of New York  
Police Officer John Doe #1  
Police Officer John Doe #2  
from the 67th precinct  
Brooklyn, New York.

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**COMPLAINT**

under the  
Civil Rights Act, 42 U.S.C. § 1983  
(Prisoner Complaint)

Jury Trial: ☒ Yes ☐ No  
(check one)

**TOWNES, J.**

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
APR 13 2015  
BROOKLYN OFFICE  
GO, M.J.

**I. Parties in this complaint:**

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

**Plaintiff**

Name Renato Scantlebury  
ID # 349-14-16630  
Current Institution Manhattan Detention Center  
Address 125 White Street  
New York 10013

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

**Defendant No. 1**

Name The City of New York Shield # \_\_\_\_\_  
Where Currently Employed \_\_\_\_\_  
Address \_\_\_\_\_

... ..

[illegible][illegible]

11-11-68

...the ...  
...the ...  
...the ...

1.03

10-11-68

100-443887-100

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

1. The first step in the process of identifying a problem is to define the problem. This involves identifying the symptoms of the problem and determining the scope of the problem. Once the problem has been defined, the next step is to identify the causes of the problem. This involves identifying the factors that are contributing to the problem and determining the underlying causes. Once the causes have been identified, the next step is to develop a plan of action. This involves identifying the steps that need to be taken to solve the problem and determining the resources that will be needed to implement the plan. Once a plan of action has been developed, the next step is to implement the plan. This involves carrying out the steps that have been identified in the plan and monitoring the progress of the implementation. Finally, the last step in the process is to evaluate the results of the implementation. This involves determining whether the problem has been solved and whether the resources have been used effectively.

... ..  
... ..  
... ..

Defendant No. 2 : Name P.O. John Doe #1 Shield # unknown  
 Where Currently Employed 67th precinct  
 Address Brooklyn, N.Y.

Defendant No. 3 : Name P.O. John Doe #2 Shield # unknown  
 Where Currently Employed 67th precinct  
 Address Brooklyn, N.Y.

Defendant No. 4 : Name \_\_\_\_\_ Shield # \_\_\_\_\_  
 Where Currently Employed \_\_\_\_\_  
 Address \_\_\_\_\_

Defendant No. 5 : Name \_\_\_\_\_ Shield # \_\_\_\_\_  
 Where Currently Employed \_\_\_\_\_  
 Address \_\_\_\_\_

## II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?  
Arrest took place while at  
liberty

B. Where in the institution did the events giving rise to your claim(s) occur?  
None

C. What date and approximate time did the events giving rise to your claim(s) occur?  
October 2014 Kings County

D. **Facts:** Plaintiff was arrested by police officers from the 67th precinct, falsely and then unlawfully imprisoned. Plaintiff was unlawfully searched and seized and subjected to mental anguish, pain and suffering arraigned on criminal charges in Kings County Criminal Court under docket number 2014KN080540 on October 2014.

What happened to you?

Who did what?

Was anyone else involved?

The plaintiff was released in his own recognizance pending future court action under Docket Number # 2014KN080540 in the Kings County Criminal Court.

Who else saw what happened?

On January-February 2015 all charges were dismissed pursuant to CPL 160.50 under Docket # 2014KN080540 in the Kings County Criminal Court.

### III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

As a result of the plaintiff's arrest, search and seizure the plaintiff lost his home, became emotionally and psychologically distressed which created pain and suffering throughout the duration of the pending charges which remain to the present.

### IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes \_\_\_ No ☒

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s). none

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes ☐ No ☒ Do Not Know ☐

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes ☐ No ☒ Do Not Know ☐

If YES, which claim(s)? \_\_\_\_\_

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes ☐ No ☒

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes ☐ No ☒

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

1. Which claim(s) in this complaint did you grieve? \_\_\_\_\_

2. What was the result, if any? \_\_\_\_\_

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. \_\_\_\_\_

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: \_\_\_\_\_

The Cause's of action  
occurred while at liberty.  
not in jail.

2. If you did not file a grievance but informed any officials of your claim, state who you informed, \_\_\_\_\_

when and how, and their response, if any: \_\_\_\_\_

none

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. \_\_\_\_\_

none

**Note:** You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

**V. Relief:**

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). As a result of the

violation of my 4th Amendment rights  
for the unlawful arrest, unlawful  
imprisonment, unlawful search and  
seizure, mental anguish, pain and  
suffering. The plaintiff seeks compensatory  
damages in the amount of \$ 100,000.00  
one hundred thousand dollars for the  
herein stated above cause's of action.

**VI. Previous lawsuits:**

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes \_\_\_\_\_ No ☒

On  
these  
claims

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff

None

Defendants

2. Court (if federal court, name the district; if state court, name the county)

3. Docket or Index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending? Yes ☐ No ☒

If NO, give the approximate date of disposition

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?)

On  
other  
claims

- C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment? Yes ☐ No ☒

- D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff

None

Defendants

2. Court (if federal court, name the district; if state court, name the county)

3. Docket or Index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending? Yes ☐ No ☒

If NO, give the approximate date of disposition

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?)

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 7 day of April, 2015

Signature of Plaintiff

Inmate Number

Institution Address

Renato Scantlebury  
349-14-16630  
Manhattan Detention  
Center 125 White St  
New York 10013

**Note:** All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 7 day of April, 2015 I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

Renato Scantlebury